

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

City of Detroit, Michigan,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

MOTION FOR LIMITED RELIEF FROM AUTOMATIC STAY

K.S. Doe (“Movant”), by and through his attorneys, files this Motion for Limited Relief from Automatic Stay for the limited purposes of asserting a claim for civil rights violations against Charles Pugh, a City of Detroit employee. In support of this Motion, Movant states as follows:

Jurisdiction

1. The above-captioned Chapter 9 proceedings were commenced by the City on July 18, 2013.
2. This motion is filed under 11 U.S.C. § 362(d), as made applicable by 11 U.S.C. § 922(b) and Fed. R. Bankr. P. 4001 and 9014.
3. This is a core proceeding over which this Court has jurisdiction. *See* 28 U.S.C. § 157(b)(2)(G) and 28 U.S.C. § 1334.

Background

4. When the City’s bankruptcy case was filed, Charles Pugh was the President of Detroit City Council, and an employee of the City of Detroit.
5. Movant, K.S. Doe, is a Michigan resident residing in the City of Highland Park.

6. In 2009, while City Council President, Charles Pugh established the Charles Pugh Leadership Forum at the Frederick Douglass Academy for Young Men (“the Academy”). At the time, Movant was a student attending the Academy.

7. Movant’s claim arises from a series of incidents beginning in 2013 when Pugh, in his capacity as City Council President and as the facilitator for the Charles Pugh Leadership Forum, sexually harassed Movant.

8. Movant’s claims are secured by the filing of a Proof of Claim with this Court on February 20, 2014. A copy of the filed form is attached as **Exhibit A**.

9. On March 21, 2014, Movant’s counsel contacted Heather Lennox of the Jones-Day law firm seeking stipulation for relief from the bankruptcy stay.

10. On March 24, 2014, Movant’s counsel sent a proposed stipulation to lift the bankruptcy stay to Stephen LaPlante of Miller, Canfield, Paddock, & Stone (co-counsel in the bankruptcy proceedings), attached hereto as **Exhibit B**.

11. Over the next seven weeks Movant’s counsel forwarded a stipulation, a draft complaint and answered all questions posed by counsel for the City of Detroit in the bankruptcy proceeding. Movant’s counsel further indicated that given Mr. Pugh’s apparent willingness to flee to avoid responsibility in this case, Movant’s counsel did not wish to file a motion that would put Pugh on notice. At that point in time, Movant was aware of where Mr. Pugh resided.

12. On April 29, 2014, Mr. LaPlante informed Movant’s counsel by email that we “should have an approved version of the stipulation and order for you by Wednesday or Thursday”. *See* **Exhibit C**.

13. On May 6, 2014, Mr. LaPlante informed Movant's counsel that the City of Detroit Law Department had denied our request, without any explanation or counter proposal, in spite of Movant's request for an explanation. *See Exhibit D.*

14. Movant seeks to file a complaint against Charles Pugh individually and the Detroit Public Schools. Movant's proof of claim against the City of Detroit has, pursuant to the Court's scheduling order, been filed in this Court. *See Exhibit A.*

15. Movant is willing to stipulate that any proceedings that directly impact the City of Detroit, including any direct action against the City, claims for indemnification and/or contribution be addressed only in this Court. Further, Movant will only seek relief from the stay that would allow the filing of a complaint against Pugh individually, the Charles Pugh Leadership Forum, and Detroit Public Schools.

Legal Basis for Motion

16. Pursuant to 11 U.S.C. § 362(d), the automatic stay created by the filing of these proceedings may be terminated, annulled, or modified for "cause". *See* 11 U.S.C. §§ 922(b) and 362(d).

17. The Bankruptcy Code does not define cause for purposes of when to allow relief from the automatic stay, so "courts must determine whether discretionary relief is appropriate on a case-by-case basis." *Trident Associates Ltd. P'ship v. Metro Life Ins. Co. (In re Trident Associates Ltd. P'ship)*, 52 F.3d 127, 131 (6th Cir. 1995).

18. To guide the bankruptcy court's exercise of its discretion, the Sixth Circuit identifies five factors for the court to consider: (1) "judicial economy"; (2) "trial readiness"; (3) "the resolution of preliminary bankruptcy issues"; (4) "the creditor's chance of success on the merits"; and (5) "the cost of defense or other potential burden to the bankruptcy estate and the

impact of the litigation on other creditors.” *Garzoni v. K-Mart Corp.(In re Garzoni)*, 35 Fed. Appx. 179, 181 (6th Cir. Mich. 2002)(citing *In re United Imports, Inc.*, 203 B.R. 162, 167 (Bankr. D. Neb. 1996)).

19. Movant asserts that cause exists for limited relief from the automatic stay for the reasons stated in the accompanying brief.

Request for Relief

WHEREFORE, Movant respectfully requests that this Court enter an order lifting the automatic stay to permit Movant to assert a claim for civil rights violations against Charles Pugh, and pursuant to the attached proposed order, no effort to collect any funds shall occur outside of this honorable court’s jurisdiction in bankruptcy, as well as grant such further relief as the Court deems just and equitable considering the facts and circumstances of this case.

STEINBERG SHAPIRO & CLARK

/s/ Tracy M. Clark (P60262)
Co-counsel for Movant
25925 Telegraph Road, Suite 203
Southfield, MI 48033
(248) 352-4700
clark@steinbergshapiro.com

-and-

SEIKALY & STEWART, P.C.

/s/ with consent William R. Seikaly (P33165)
Choi T. Portis (P77123)
Co-counsel for Movant
30300 Northwestern Hwy., Suite 200
Farmington Hills, Michigan 48334
(248) 785-0102
wrs@sslawpc.com

Dated: May 9, 2014

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

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Chapter 9

Case No. 13-53846

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ORDER GRANTING MOTION FOR LIMITED RELIEF FROM AUTOMATIC STAY

This matter having come to be heard on the Motion for Limited Relief from the Automatic Stay filed by K.S. Doe, Movant. All parties in interest were provided notice of the Motion and the Court is advised that no objections were filed or received. The Court is otherwise fully advised in this matter.

IT IS ORDERED that:

- A. The Motion for Limited Relief from the Automatic Stay is granted.
- B. Relief from that automatic stay applicable under 11 U.S.C. § 922(a) and 11 U.S.C. § 362(a) is granted to allow Movant to prosecute claims for civil rights violations against Charles Pugh.
- C. Movant shall not make any effort to collect any funds from the City of Detroit outside of this Court's jurisdiction.
- D. The provisions of Fed. R. Bankr. P. 4001(a)(3) are waived and this Order shall be in full force and effect upon entry.

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

City of Detroit, Michigan,
2 Woodward Avenue, Suite 1126
Detroit, MI 48226
xx-xxx4606

Chapter 9
Case No. 13-53846
Hon. Steven W. Rhodes

Debtor.

14 DAY NOTICE OF MOTION FOR LIMITED RELIEF FROM AUTOMATIC STAY

K.S Doe, Movant, filed a motion seeking limited relief from the automatic stay for the purpose of pursuing claims for civil rights violations against Charles Pugh.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the Trustee's motion, or if you want the Court to consider your views on the motion, within 14 days from the date this notice is served, you or your attorney must:

1. File with the Court a written objection or request for hearing, explaining your position at:¹

U.S. Bankruptcy Court
211 West Fort Street
Detroit, Michigan 48226

If you mail your objection or request for hearing to the Court for filing, you must mail it early enough so the Court will **receive** it before the 14 day period expires.

2. Mail a copy to:

Tracy M. Clark, Esq.
Steinberg Shapiro & Clark
25925 Telegraph Rd., Suite 203
Southfield, MI 48033

-and-

¹Objection or request for hearing must comply with F.R. Civ.P. 8(b), (c) and (e).

William R. Seikaly, Esq.
Seikaly & Stewart, P.C.
30300 Northwestern Highway, Suite 200
Farmington Hills, MI 48334

If an objection or request for hearing is timely filed, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time, and location of the hearing.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

STEINBERG SHAPIRO & CLARK

/s/ Tracy M. Clark (P60262)
Co-counsel for Movant
25925 Telegraph Road, Suite 203
Southfield, MI 48033
(248) 352-4700
clark@steinbergshapiro.com

-and-

SEIKALY & STEWART, P.C.

/s/ with consent William R. Seikaly (P33165)
Choi T. Portis (P77123)
Co-counsel for Movant
30300 Northwestern Hwy., Suite 200
Farmington Hills, Michigan 48334
(248) 785-0102
wrs@sslawpc.com

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**BRIEF IN SUPPORT OF MOTION FOR
LIMITED RELIEF FROM AUTOMATIC STAY**

Facts

K.S. Doe (“Movant”) relies on the facts, authority, and exhibits cited and attached in his Motion for Limited Relief From Automatic Stay. Further, this case involves lifting the stay to pursue claims against former City Council President, Charles Pugh. In his capacity as City Council President, he established the Charles Pugh Leadership Forum at the Academy. This program was designed to provide mentorship to students attending the Academy. The program then developed into a mandatory class for high school seniors. Pugh, in his capacity as City Council President, used his power, title, and prestige to target vulnerable young men, including but not limited to Movant. As such, he used his position and title as an opportunity to sexually harass Movant.

Law

An automatic stay serves several purposes. First, it gives a bankrupt a breathing spell from creditors by stopping all collection efforts, all harassment, and all foreclosure actions. The stay is “automatic” because it is triggered as against all entities upon the filing of a bankruptcy petition, irrespective of whether the parties to the proceedings stayed are aware that a petition has been filed. Only the bankruptcy court with jurisdiction over the case has the authority to grant

relief from the stay of judicial proceedings against the debtor. *Maritime Elec. Co., Inc. v. United Jersey Bank*, 959 F.2d 1194, 1204 (3rd Cir. 1991).

In this case, this Court entered an order on July 25, 2013 whereby all persons were stayed, restrained, and enjoined from commencing any judicial, administrative, or other proceeding that would have been commenced before the City's chapter 9 case was commenced (docket 167). The order further stayed commencement of any action against City Officers, in whatever capacity they may serve. This case specifically involves one of the highest-ranking officials in the City of Detroit, the Council President. In his capacity as City Council President, Pugh established the Charles Pugh Leadership Forum at the Academy. He used his power, prestige, and title to place himself in a position to abuse Movant. As such, the stay prohibiting commencement of any action against City Officers must be lifted in order to make Movant whole.

For reasons unknown to Movant's counsel, the City of Detroit has refused to stipulate to the relief requested herein, without explanation, in spite of their history of doing this in other matters. (*See* docket 2584.)

In exercising its power to vacate or modify a stay, the court must consider the particular circumstances of the case and ascertain what is just to the claimants, the debtor, and the estate. *In re Mego Intern., Inc.*, 28 B.R. 324, 326 (Bkrtcy. S.D.N.Y. 1983).

In this case, Movant and his family have suffered emotional and psychological damage as a result of Pugh's actions. Additionally, Movant was taunted and harassed not only by his peers, but also by the press as a result of these incidents. Conversely, Pugh has suffered only shame and embarrassment that he brought upon himself as a result of his sexual harassment of Movant. In weighing the particulars of this case, it is clear that Movant's harms and damages greatly

outweigh Pugh's self-inflicted embarrassment. As such, this Court is requested to lift this stay in order to allow Movant to vindicate his rights.

Based on the foregoing, Movant respectfully requests that this Court grant relief from the automatic stay, for the limited purpose of allowing Movant to assert a claim for civil rights violations against Charles Pugh.

STEINBERG SHAPIRO & CLARK

/s/ Tracy M. Clark (P60262)

Co-counsel for Movant
25925 Telegraph Road, Suite 203
Southfield, MI 48033
(248) 352-4700
clark@steinbergshapiro.com

-and-

SEIKALY & STEWART, P.C.

/s/ with consent William R. Seikaly (P33165)

Choi T. Portis (P77123)
Co-counsel for Movant
30300 Northwestern Hwy., Suite 200
Farmington Hills, Michigan 48334
(248) 785-0102
wrs@sslawpc.com

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CERTIFICATE OF SERVICE

I certify that on May 9, 2014, I served a copy of this *Motion for Limited Relief from Automatic Stay; Proposed Order; 14 Day Notice; Brief in Support; and Certificate of Service* via first class mail on the following:

Charles Pugh
145 Odell Clark Place, Apt. 5W
New York, NY 10030

And I certify that on May 9, 2014, I electronically filed this *Motion for Limited Relief from Automatic Stay; Proposed Order; 14 Day Notice; Brief in Support; and Certificate of Service* with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

- Elizabeth M. Abood-Carroll bankruptcy@orlans.com, ANHSOA@earthlink.net
- Daniel N. Adams dadams@honigman.com, litdocket@honigman.com
- Sam J. Alberts sam.alberts@dentons.com, dan.barnowski@dentons.com
- Carla Orman Andres candres@gklaw.com
- Mark A. Angelov mark.angelov@arentfox.com
- Charles N. Ash cash@wnj.com, kkranz@wnj.com
- Karin F. Avery Avery@SilvermanMorris.com
- Nabih H. Ayad ayadlaw@hotmail.com
- Allison Bach abach@dickinsonwright.com
- Jason W. Bank jbank@kerr-russell.com
- Paige E. Barr Paige.Barr@kattenlaw.com
- Robert N. Bassel rbassel@gmail.com, robertbassel@hotmail.com

- Kevin M. Baum kevin.baum@kattenlaw.com
- Dirk H. Beckwith dbeckwith@fosterswift.com
- Michael R. Bell BellM1@michigan.gov
- Bruce Bennett bbennett@jonesday.com
- Ryan Blaine Bennett ryan.bennett@kirkland.com,
dustin.paige@kirkland.com;lally.gartel@kirkland.com;maureen.mccarthy@kirkland.com
;dan.hill@kirkland.com;noah.ornstein@kirkland.com
- Douglas C. Bernstein dbernstein@plunkettcooney.com,
ssherbow@plunkettcooney.com
- Brendan G. Best bbest@schaferandweiner.com, wkyles@schaferandweiner.com
- Jeffrey H. Bigelman jhb_ecf@osbig.com, tc@osbig.com
- William C. Blasses wcb@osbig.com
- Brett A. Border bborder@sspclegal.com, joumedian@sspclegal.com
- Randall A. Brater randall.brater@arentfox.com
- Mark E. Bredow mbredow@resnicklaw.net, jabdelnour@resnicklaw.net
- Allan S. Brilliant allan.brilliant@dechert.com
- Lynn M. Brimer lbrimer@stroblpc.com, kvanakin@stroblpc.com
- Charles D. Bullock cbullock@sbplclaw.com,
cdbullock@msn.com;lhaas@sbplclaw.com
- Judy B. Calton jcalton@honigman.com, litdocket@honigman.com
- Judy B. Calton jcalton@honigman.com,blundberg@honigman.com,
litdocket@honigman.com
- Peter L. Canzano pcanzano@sidley.com
- Eric D. Carlson carlson@millercanfield.com
- Julia A. Caroff julia.caroff@usdoj.gov,
mary.compeau@usdoj.gov;michele.gangler@usdoj.gov;jennifer.bielecki@usdoj.gov
- Amy D. Caton acaton@kramerlevin.com, achouprouta@kramerlevin.com
- Babette A. Ceccotti bceccotti@cwsny.com
- Thomas P. Christy tchristy@garanlucow.com
- Tracy M. Clark clark@steinbergshapiro.com, clark@ecf.inforruptcy.com

- Mary Beth Cobbs cobbm@detroitmi.gov, mbcobbs@flash.net
- Ryan Cochran ryan.cochran@wallerlaw.com
- Carol Connor Cohen carol.cohen@arentfox.com
- Dawn R. Copley dcopley@dickinsonwright.com, dnavin@dickinsonwright.com
- Sean M. Cowley (UST) Sean.cowley@usdoj.gov
- Elliot G. Crowder ecrowder@sbplclaw.com, lhaas@sbplclaw.com
- Robert Darnell robert.darnell@usdoj.gov
- Hugh M. Davis Info@ConLitPC.com
- Peter D. Dechiara pdechiara@cwsny.com
- Shannon L. Deeby sdeeby@clarkhill.com
- Melissa L. Demorest melissa@demolaw.com, paula@demolaw.com
- M. Ellen Dennis m.ellen.dennis@gmail.com, dwhadden@umich.edu
- Robert J. Diehl rdiehl@bodmanlaw.com
- Karen B. Dine karen.dine@kattenlaw.com
- Mercedes Varasteh Dordeski mdordeski@foleymansfield.com, cindy@loevy.com
- David L. Dubrow david.dubrow@arentfox.com
- Ethan D. Dunn bankruptcy@maxwelldunnlaw.com,
bankruptcy.maxwelldunn@gmail.com
- Jeffrey David Eaton jeaton@schiffhardin.com
- John E. Eaton jeaton@cousenslaw.com, pjohnson@bredhoff.com
- David Eisenberg deisenberg@ermanteicher.com
- Caroline Turner English caroline.english@arentfox.com
- Earle I. Erman eerman@ermanteicher.com
- Barry S. Fagan bfagan@dibandfagan.com
- Sherrie L. Farrell sfarrell@dykema.com,
mpearson@dykema.com; docket@dykema.com
- Evan Justin Feldman efeldman@clarkhill.com
- Lisa Hill Fenning Lisa.Fenning@aporter.com

- Robert Fetter rfetter@millercohen.com,
richardmack@millercohen.com;mcoil@millercohen.com;ddorie@millercohen.com;bruce
miller@millercohen.com
- Mallory Field MField@stroblpc.com, jmckeogh@stroblpc.com
- Jamie Scott Fields jeansartre@msn.com
- Joseph M. Fischer brcy@carsonfischer.com, jfischer@carsonfischer.com
- Deborah L. Fish dfish@allardfishpc.com, allardfishpc@yahoo.com
- Joseph Mark Fisher mfisher@schiffhardin.com
- Robert M. Fishman rfishman@shawfishman.com
- Steven B. Flancher flanchers@michigan.gov
- Vanessa G. Fluker vgflawyer@sbcglobal.net, dfjohnson@cfaith.com
- Mark S. Frankel mfrankel@couzens.com
- Brendan H. Frey bfrey@manteselaw.com, ssikorski@manteselaw.com
- Timothy A. Fusco fusco@millercanfield.com
- Eric B. Gaabo gaabe@detroitmi.gov
- Joshua A. Gadharf jgadharf@mcdonaldhopkins.com
- Niraj R. Ganatra Nganatra@uaw.net
- Andrew J. Gerdes
agerdes@gerdesplc.com,wwkannel@mintz.com,awalker@mintz.com, ajg-
ecf@hotmail.com
- Jerome D. Goldberg apclawyer@sbcglobal.net
- William H. Goodman mail@goodmanhurwitz.com
- Robert D. Gordon rgordon@clarkhill.com, lbellguzzo@clarkhill.com
- Jeffrey S. Grasl jgrasl@mcdonaldhopkins.com, sharrow@mcdonaldhopkins.com
- Timothy R. Graves tgraves@allardfishpc.com, allardfishpc@yahoo.com
- Jonathan S. Green green@millercanfield.com
- John T. Gregg jgregg@btlaw.com
- Christopher A. Grosman BRCY@CarsonFischer.com, cgrosman@carsonfischer.com
- Stephen M. Gross sgross@mcdonaldhopkins.com, shelly.harrow@gmail.com

- Stephen B. Grow sgrow@wnj.com, kfrantz@wnj.com
- Edward J. Gudeman ejgudeman@gudemanlaw.com, ecf@gudemanlaw.com
- Raymond Guzall rayguzall@attorneyguzall.com
- Stephen C. Hackney stephen.hackney@kirkland.com
- Paul R. Hage phage@jaffelaw.com, jtravick@jaffelaw.com
- Paula A. Hall hall@bwst-law.com, marbury@bwst-law.com;pleban@bwst-law.com
- Michael C. Hammer mchammer2@dickinsonwright.com
- Howard R. Hawkins howard.hawkins@cwt.com,
mark.ellenberg@cwt.com;jason.jurgens@cwt.com;ellen.halstead@cwt.com
- David Gilbert Heiman dgheiman@jonesday.com
- Robert S. Hertzberg hertzbergr@pepperlaw.com,
alexsym@pepperlaw.com;kuschj@pepperlaw.com
- Steven G. Howell showell@dickinsonwright.com
- Marshall S. Huebner bankrout@davispolk.com
- Charles Bruce Idelsohn charlesidelsohnattorney@yahoo.com, charlesID@hotmail.com
- Mark R. James mrj@wvrplaw.com
- William W. Kannel wkannel@mintz.com
- John P. Kapitan easternecf@trottlaw.com
- Michael Anthony Karman makarmanesq@gmail.com
- Michael Joseph Karwoski mjkarwoski@alumni.nd.edu
- Mami Kato mkato@sachswaldman.com, pmerchak@sachswaldman.com
- Richardo I. Kilpatrick ecf@kaalaw.com, wjackson@KAALaw.com
- Susheel Kirpalani susheelkirpalani@quinnemanuel.com,
monicatarazi@quinnemanuel.com
- Scott B. Kitei skitei@honigman.com
- Anthony J. Kochis akochis@wolfsonbolton.com,
stravis@wolfsonbolton.com;hkrstich@wolfsonbolton.com;hkrstich@ecf.inforuptcy.com;
akochis@ecf.inforuptcy.com

- Samuel S. Kohn skohn@chadbourne.com,
mroitman@chadbourne.com;japfel@chadbourne.com;sbloomfield@chadbourne.com;lsc
hapira@chadbourne.com
- Dan Korobkin dkorobkin@aclumich.org
- Deborah Kovsky-Apap kovskyd@pepperlaw.com, alexsym@pepperlaw.com
- Kay Standridge Kress kressk@pepperlaw.com, alexsym@pepperlaw.com
- Stephen S. LaPlante laplante@millercanfield.com, skoczylas@millercanfield.com
- Patrick C. Lannen plannen@plunkettcooney.com, mkisell@plunkettcooney.com
- Lawrence A. Larose llarose@chadbourne.com,
skohn@chadbourne.com;japfel@chadbourne.com;mroitman@chadbourne.com;sbloomfi
eld@chadbourne.com
- Caralyce M. Lassner ecf@lassnerlaw.com
- Michael S. Leib msl@maddinhauser.com, bac@maddinhauser.com
- David E. Lemke david.lemke@wallerlaw.com
- Heather Lennox hlennox@jonesday.com
- David A. Lerner dlerner@plunkettcooney.com, nwinagar@plunkettcooney.com
- Richard Levin rlevin@cravath.com, mao@cravath.com
- Sharon L. Levine slevine@lowenstein.com
- David T. Lin dlin@seyburn.com, kbilpo@seyburn.com
- Ronald C. Liscombe rliscombe@alglawpc.com
- William Norman Listman wlistman@davislistman.com
- Sara Klettke MacWilliams macwilliams@youngpc.com, efiling@youngpc.com
- Elias T. Majoros emajoros@glmpc.com
- Carolyn Beth Markowitz DVCCOUNSEL@AOL.COM
- Donald G. McGuigan don@mcguiganlaw.com
- Patrick E. Mears pmears@btlaw.com
- Leah Montesano leah.montesano@arentfox.com
- Claude D. Montgomery claudemontgomery@dentons.com,docketny@dentons.com,
carole.neville@dentons.com;sam.alberts@dentons.com

- Claude D. Montgomery claudemontgomery@dentons.com,
carole.neville@dentons.com;sam.alberts@dentons.com
- Thomas R. Morris morris@silvermanmorris.com, marlene@silvermanmorris.com
- Wolfgang Mueller wmueller@olsmanlaw.com, jsmith@olsmanlaw.com
- Harold E. Nelson ecf-hen@rhoadesmckee.com
- Fred Neufeld fneufeld@sycr.com
- Carole Neville carole.neville@dentons.com
- Karen Vivian Newbury knewbury@schiffhardin.com
- Max J. Newman newman@butzel.com
- Kenneth E. Noble kenneth.noble@kattenlaw.com, nyc.bknotices@kattenlaw.com
- Eric David Novetsky enovetsky@jaffelaw.com
- Sandra L. O'Connor soconnor@glmpc.com
- Brian D. O'Keefe bokeefe@lippittokeefe.com, TReitzloff@lippittokeefe.com
- Arthur O'Reilly aoreilly@honigman.com, ahatcher@honigman.com
- Lisa Okasinski lisa@demolaw.com
- Noah J. Ornstein noah.ornstein@kirkland.com
- Yuliy Osipov yotc_ecf@yahoo.com, yo_ecf@osbig.com;tc_ecf@osbig.com
- Michael R. Paslay mike.paslay@wallerlaw.com,
Cathy.thomas@wallerlaw.com;Chris.cronk@wallerlaw.com;David.lemke@wallerlaw.com;
Ryan.cochran@wallerlaw.com;Courtney.rogers@wallerlaw.com;Gerald.mace@wallerlaw.com
- Barbara A. Patek bpatek@ermanteicher.com
- Andrew A. Paterson aap43@outlook.com, aap43law@gmail.com
- Geoffrey T. Pavlic pavlic@steinbergshapiro.com, jbrown@steinbergshapiro.com
- Randall A. Pentiuk RPentiuk@PCK-Law.Com, Pentiukpc@aol.com
- Alfredo R. Perez
alfredo.perez@weil.com,kelly.dibiasi@weil.com,dana.kaufman@weil.com,brian.wells@weil.com
- Alfredo R. Perez
alfredo.perez@weil.com,kelly.dibiasi@weil.com,debora.hoehne@weil.com,elizabeth.hende@weil.com

- Heidi Peterson hdpeterson75@gmail.com
- Ryan Plecha rplecha@lippittokeefe.com, jgreeniajdobrzycki@lippittokeefe.com
- Debra N. Pospiech dpospiech@morganmeyers.com
- Leland Prince princel@dteenergy.com
- Thomas B. Radom Radom@butzel.com
- A. Stephen Ramadan steveramadan@gmail.com
- John Joseph Ramirez john.ramirez@kattenlaw.com
- H. Nathan Resnick hnresnick@resnicklaw.net, jabdelnour@resnicklaw.net
- Peter J. Roberts proberts@shawfishman.com
- Kimberly Joan Robinson kim.robinson@bfkn.com
- Richard A. Roble (UST) Richard.A.Roble@usdoj.gov
- Louis P. Rochkind lrochkind@jaffelaw.com, dburris@jaffelaw.com
- Courtney M. Rogers courtney.rogers@wallerlaw.com
- Ronald L. Rose rrose@dykema.com
- Eric Rosenberg EJR@morganmeyers.com, amendiola@morganmeyers.com
- Heath Douglas Rosenblat Heath.Rosenblat@dbr.com,
Jennifer.Roussil@dbr.com;Daniel.Northrop@dbr.com
- Jeffrey Rossman jrossman@mwe.com
- Jeffrey Rossman jrossman@mwe.com, ncoco@mwe.com, Lhaidostian@mwe.com
- Craig B. Rule bankruptcy@orlans.com, ANHSOA@earthlink.net
- Edward Todd Sable tsable@honigman.com, litdocket@honigman.com
- Kenneth M. Schneider kschneider@schneidermiller.com
- Matthew Schneider SchneiderM7@michigan.gov
- Joseph R. Sgroi jsgrai@honigman.com, litdocket@honigman.com
- Mark H. Shapiro shapiro@steinbergshapiro.com, jbrown@steinbergshapiro.com
- Howard S. Sher howard@jacobweingarten.com
- John P. Sieger john.sieger@kattenlaw.com
- Jeffery R. Sieving jeff@iobillboard.com

- Jill Kristen Smith Jill.Smith@macombgov.org
- William Pfeiffer Smith wsmith@mwe.com
- James Sprayregen james.sprayregen@kirkland.com
- Douglas Steele dls@wmlaborlaw.com
- Kevin N. Summers ksummers@dflaw.com,
mmichael@psedlaw.com;ccook@dflaw.com
- Matthew Gernet Summers summersm@ballardspahr.com
- Marc N. Swanson swansonm@millercanfield.com
- Meredith Taunt mtaunt@stroblpc.com, KVanAkin@stroblpc.com
- Ralph A. Taylor ralph.taylor@arentfox.com
- Julie Beth Teicher jteicher@ermanteicher.com
- Kurt Thornbladh kthornbladh@gmail.com, thornbladh.kurt3@gmail.com
- My Chi To mcto@debevoise.com, mao-bk-ecf@debevoise.com
- Sheryl L. Toby stoby@dykema.com, dguerrero@dykema.com
- Sheldon S. Toll lawtoll@comcast.net, lawtoll@comcast.net
- Matthew Troy matthew.troy@usdoj.gov
- Brian R. Trumbauer btrumbauer@bodmanlaw.com
- Suzanne L. Wahl swahl@schiffhardin.com,
mosullivan@schiffhardin.com;dchapman@schiffhardin.com;lmisisian@schiffhardin.com
;edocket@schiffhardin.com
- Scott M. Watson swatson@wnj.com
- Daniel J. Weiner dweiner@schaferandweiner.com
- Jason L. Weiner jweiner@mcdonaldhopkins.com, sharrow@mcdonaldhopkins.com
- Robert A. Weisberg BRCY@CARSONFISCHER.COM,
rweisberg@carsonfischer.com
- William A. Wertheimer billwertheimer@gmail.com
- Matthew Wilkins wilkins@bwst-law.com, marbury@bwst-law.com
- Angela Williams williamsa@dhcml.org, HollisR@dhcml.org
- Jeremiah Buffalo Wirgau jwirgau@sspclegal.com

- Scott A. Wolfson
swolfson@wolfsonbolton.com,david.rosenzweig@nortonrosefulbright.com,melanie.kotler@nortonrosefulbright.com,
stravis@wolfsonbolton.com;hkrstich@wolfsonbolton.com;hkrstich@ecf.inforuptcy.com
- Stephen Wolpert stephen.wolpert@dechert.com
- David M. Zack dmzack@mcaldpinelawfirm.com,
nanichols@mcaldpinelawfirm.com;dwblevins@mcaldpinepc.com;mrsanborn@mcaldpinepc.
com;rwjezdimir@mcaldpinepc.com
- Trevor J. Zamborsky tzamborsky@romanolawpllc.com, trevor.zamborsky@gmail.com
- Jennifer Zbytowski Belveal jbelveal@honigman.com, mjohnson@honigman.com
- Craig E. Zucker czucker@ermanteicher.com

/s/ Christine T. Leach, Legal Assistant
Steinberg Shapiro & Clark
Attorneys for Trustee
25925 Telegraph Rd., Suite 203
Southfield, MI 48033
(248) 352-4700
cleach@steinbergshapiro.com

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

City of Detroit, Michigan,

Debtor.

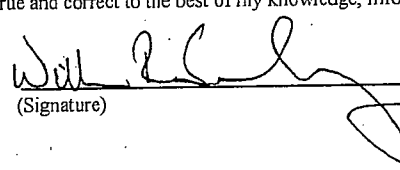
Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

EXHIBIT LIST

Exhibit	Description
A	Proof of Claim
B	Email dated March 24, 2014
C	Email dated April 29, 2014
D	Email dated May 6, 2014

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT of MICHIGAN		CHAPTER 9 PROOF OF CLAIM
Name of Debtor: City of Detroit, Michigan		Case Number: 13-53846
NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing.		
Name of Creditor (the person or other entity to whom the debtor owes money or property): K. S. Doe		FILED FEB 20 2014 COURT USE ONLY
Name and address where notices should be sent: William R. Seikaly (P33165) 30300 Northwestern Highway, Suite 200 Farmington Hills, MI 48334 Telephone number: 2487850102 email: wrs@sslawpc.com		<input type="checkbox"/> Check this box if this claim amends a previously filed claim. US Bankruptcy Court MI Eastern District Court Claim Number: _____ (If known) Filed on: _____
Name and address where payment should be sent (if different from above): Telephone number: _____ email: _____		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving particulars.
1. Amount of Claim as of Date Case Filed: \$ <u>Amount to be determined in excess of \$1 Million Dollars</u>		
If all or part of the claim is secured, complete item 4. If all or part of the claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.		
2. Basis for Claim: <u>personal injury/ violation of civil rights, 42 USC 1983, against Dave Bing as Mayor</u> (See instruction #2) <u>and Charles Pugh, individually, and as City Council President as well as the City of Detroit.</u>		
3. Last four digits of any number by which creditor identifies debtor: _____	3a. Debtor may have scheduled account as: _____ (See instruction #3a)	
4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: _____ Value of Property: \$ _____ Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed or <input type="checkbox"/> Variable		Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____
5. Amount of Claim Entitled to Priority as an Administrative Expense under 11 U.S.C. §§ 503(b)(9) and 507(a)(2). \$ _____		
5b. Amount of Claim Otherwise Entitled to Priority. Specify Applicable Section of 11 U.S.C. § _____ \$ _____		
6. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)		
7. Documents: Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. (See instruction #7, and the definition of "redacted".) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain: _____		
8. Signature: (See instruction # 8) Check the appropriate box.		
<input type="checkbox"/> I am the creditor. <input type="checkbox"/> I am the creditor's authorized agent. <input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. <input type="checkbox"/> I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.) (See Bankruptcy Rule 3004.)		
I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.		
Print Name: William R. Seikaly Title: Attorney Company: Seikaly & Stewart, P.C. Address and telephone number (if different from notice address above): 30300 Northwestern Highway Suite 200 Farmington Hills, MI 48334 Telephone number: 2487850102 email: wrs@sslawpc.com		<div style="text-align: center;">  (Signature) </div> <div style="text-align: center;"> February 20, 2014 (Date) </div>

In re: City of Detroit Michigan Chapter 9 Bankruptcy

Choi Portis

Mon 3/24/2014 1:32 PM

To: LaPlante@millercanfield.com <LaPlante@millercanfield.com>;

Cc: William Seikaly <wrs@sslawpc.com>;

 1 attachment

stip and order for relief from stay.pdf;

Hello Mr. LaPlante,

My name is Choi Portis and I am an associate attorney at Seikaly & Stewart, P.C. I contacted Heather Lennox from Jones Day regarding this issue, and she indicated that I should contact you.

We have a case in which we would like to seek a stipulation from you regarding limited relief from the automatic stay put in place by Judge Rhodes's order. I have attached the stipulation to this email. I have also copied, William Seikaly, the senior attorney on this file.

In the event that you do not agree to the stipulation, we are prepared to file a motion for limited relief from the stay.

Kindest Regards,

Choi Portis

Choi T. Portis

Associate Attorney

Seikaly & Stewart, P.C.

30300 Northwestern Highway, Suite 200

Farmington Hills, MI 48334

(248) 785-0102, ext 264

Fax (248) 737-8033

ctp@seikalystewart.com

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**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN;

Chapter 9
Case No. 13-53846
Hon. Steven W. Rhodes

Debtor,

SEIKALY & STEWART, P.C.
Attorneys for Plaintiff-Creditor
WILLIAM R. SEIKALY (P33165)
CHOI T. PORTIS (P77123)
30300 Northwestern Hwy., Ste. 200
Farmington Hills, MI 48334
(248) 785-0102
wrs@sslawpc.com

MILLER, CANFIELD, PADDOCK, & STONE,
PLC
STEPHEN S. LAPLANTE (P48063)
Attorney for Defendant-Debtor
150 W Jefferson Ave. Ste. 2500
Detroit, MI 48226
(313) 496-8452
laplante@millercanfield.com

STIPULATION REGARDING LIMITED RELIEF FROM AUTOMATIC STAY

STIPULATION

Through their respective counsel, Creditor-Plaintiff, K.S. Doe and Debtor-Defendant City of Detroit here by stipulate and agree as follows:

IT IS HEREBY STIPULATED AND AGREED that the automatic stay issued by this Court on July 25, 2013 is lifted for the limited purpose of allowing Creditor-Plaintiff, K.S. Doe to assert claims of civil rights violations against Charles Pugh and others, provided that the City of Detroit not be named in the lawsuit nor shall any effort be made to collect against the City of Detroit, absent further order of this Court.

WILLIAM R. SEIKALY (P33165)
Attorney for Creditor-Plaintiff

STEPHEN S. LAPLANTE (P48063)
Attorney for City of Detroit

ORDER

At a session of said Court held in the
United States Courthouse in the
Eastern District of Michigan,
this _____ day of March, 2014.

PRESENT: HON. STEVEN W. RHODES
United States Bankruptcy Court Judge

This matter having come before the Court on the Stipulation of the parties, the Court having reviewed said Stipulation and otherwise being fully advised in the premises:

IT IS HERE BY ORDERED that the automatic stay issued by this Court on July 25, 2013 is lifted for the limited purpose of allowing Creditor-Plaintiff, K.S. Doe to assert claims of civil rights violations against Charles Pugh and others, provided that the City of Detroit not be named in the lawsuit nor shall any effort be made to collect against the City of Detroit, absent further order of this Court.

Hon. Steven W. Rhodes
United States Bankruptcy Court Judge

RE: Stipulation

LaPlante, Stephen S. <laplante@MillerCanfield.com>

Tue 4/29/2014 6:22 PM

To: Choi Portis <ctp@sslawpc.com>;

Cc: William Seikaly <wrs@sslawpc.com>;

Dear Ms. Portis,

I should have an approved version of the stipulation and order for you by Wednesday or Thursday at the latest.

Regards,

Stephen S. LaPlante | Attorney and Counselor at Law
Miller Canfield
150 West Jefferson, Suite 2500
Detroit, Michigan 48226 (USA)
T +1.313.496.8478 | F +1.313.496.8452 | **Mobile** +1.734.635.0322
laplante@millercanfield.com | [View Profile + VCard](#)

From: Choi Portis [mailto:ctp@sslawpc.com]
Sent: Tuesday, April 29, 2014 3:25 PM
To: LaPlante, Stephen S.
Cc: William Seikaly
Subject: Stipulation

Mr. LaPlante,

Can you provide a status update on when we should expect the stipulation.

Kindest Regards,

Choi Portis

Choi T. Portis

Associate Attorney

Seikaly & Stewart, P.C.

30300 Northwestern Highway, Suite 200

13-53846-tjt Doc 4554 Filed 05/09/14 Entered 05/09/14 12:24:11 Page 26 of 30

Farmington Hills, MI 48334
(248) 785-0102, ext 264
Fax (248) 737-8033
ctp@seikalystewart.com

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DISCLOSURE UNDER TREASURY CIRCULAR 230: The United States Federal tax advice, if any, contained in this document and its attachments may not be used or referred to in the promoting, marketing or recommending of any entity, investment plan or arrangement, nor is such advice intended or written to be used, and may not be used, by a taxpayer for the purpose of avoiding Federal tax penalties.

RE: Stipulation

LaPlante, Stephen S. <laplante@MillerCanfield.com>

Tue 5/6/2014 2:06 PM

To: William Seikaly <wrs@sslawpc.com>; Choi Portis <ctp@sslawpc.com>;

Mr. Seikaly and Ms. Portis:

The City Law Department did not approve the proposed stipulation. Please send me a copy of the complaint once it has been served.

Regards,

Stephen S. LaPlante | Attorney and Counselor at Law
Miller Canfield
150 West Jefferson, Suite 2500
Detroit, Michigan 48226 (USA)
T +1.313.496.8478 | F +1.313.496.8452 | **Mobile** +1.734.635.0322
laplante@millercanfield.com | [View Profile + VCard](#)

From: Choi Portis [mailto:ctp@sslawpc.com]
Sent: Monday, May 05, 2014 1:01 PM
To: LaPlante, Stephen S.
Cc: William Seikaly
Subject: Re: Stipulation

Thank you. Any idea on how about long they will take to come to a decision?

Choi

Sent from my iPhone

On May 5, 2014, at 12:58 PM, "LaPlante, Stephen S." <laplante@MillerCanfield.com> wrote:

Choi, I spoke with the City Law Department and they were taking it up for consideration. I am waiting for a response.

<image001.gif>

Stephen S. LaPlante

Miller, Canfield, Paddock and Stone, P.L.C.

13-53846-tjt Doc 4554 Filed 05/09/14 Entered 05/09/14 12:24:11 Page 28 of 30

150 W. Jefferson Ave., Suite 2500
Detroit, Michigan 48226
(313) 963-6420
Direct Dial (313) 496-8478
Fax (313) 496-8452
Cell phone (734) 635-0322
laplante@millercanfield.com

From: Choi Portis [<mailto:ctp@sslawpc.com>]
Sent: Monday, May 05, 2014 12:52 PM
To: LaPlante, Stephen S.
Cc: William Seikaly
Subject: Re: Stipulation

Stephen,

Do you have an update on the stipulation?

Choi

Sent from my iPhone

On Apr 29, 2014, at 6:22 PM, "LaPlante, Stephen S." <laplante@MillerCanfield.com> wrote:

Dear Ms. Portis,

I should have an approved version of the stipulation and order for you by Wednesday or Thursday at the latest.

Regards,

Stephen S. LaPlante | Attorney and Counselor at Law
Miller Canfield
150 West Jefferson, Suite 2500
Detroit, Michigan 48226 (USA)
T +1.313.496.8478 | F +1.313.496.8452 | **Mobile** +1.734.635.0322
laplante@millercanfield.com | [View Profile + VCard](#)

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Cc: William Seikaly
Subject: Stipulation

Mr. LaPlante,

Can you provide a status update on when we should expect the stipulation.

Kindest Regards,

Choi Portis

Choi T. Portis

Associate Attorney

Seikaly & Stewart, P.C.

30300 Northwestern Highway, Suite 200

Farmington Hills, MI 48334

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